

## EXHIBIT 258

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McKesson's Controlled Substance Monitoring Program  
Oxycodone Threshold Reduction Report

**Date:** February 9<sup>th</sup>, 2015

**By:** Nate Hartle, Sr. Director of Regulatory Affairs

**RNA Customer Name:** Multiple RNA Customers

**OVERVIEW:**

On this date I Nate Hartle, Sr. Director of Regulatory Affairs made reductions to oxycodone thresholds in the SAP system affecting 2,624 RNA customers. These changes were part of an ongoing review and analysis of thresholds to consistently and programmatically reduce the gap between customer's purchases and their current thresholds. This is being implemented as a short term solution while waiting for AGI to develop more robust statistically driven thresholds. Below is the high level process used for RNA.

**DATA ORGANIZATION:**

All relevant information was gathered and organized in a spreadsheet for review to include the following:

- **Registrant Information** – DEA #, store name and #, chain, location, etc.
- **Current Thresholds** – Current SAP threshold for base code 9143 (oxycodone).
- **Oxycodone Purchases** – Past 12 months of purchases.
- **Previous Threshold Changes** – Any threshold changes for 9143 in the past 6 months including the date and text comments.

**THRESHOLD REVIEW / CALCULATION:**

1. **6 Month Maximum** – The previous six months were reviewed and the maximum month was identified.
2. **New Threshold Amount** – The maximum amount was used along with a buffer of 25% to account for variations by month, and the amount was rounded to the next 1000.
3. **Current Threshold Review** – The new proposed threshold was compared against current thresholds and only registrants identified as being eligible for a reduction were moved to the next stage of review.
4. **Past Threshold Changes** – Threshold changes for the past six months were reviewed and the amount and reason text were pulled into the spreadsheet. Dates and reason texts were reviewed and some registrant reductions were changed due to recent TCR requests and reviews by the DRA.
5. **New Supply Chain Agreements** – Select RNA customers were reviewed and removed from the total process due to recent supply change agreements that will cause purchase information to change over the next months. For example, Price Chopper, Hy-Vee and Wakefern were removed after initial review and will be re-evaluated in 3-6 months.

**AUDIT:**

Once the initial list of registrants was finalized, an audit was performed to pull in January purchase amounts to validate new thresholds and determine if any beginning of month changes may have affected the calculations. Micheal Bishop pulled new January totals on February 3<sup>rd</sup> and it was determined that 13 registrants had new January totals that were now the 6 months max. These 13 were recalculated and adjusted in the original spreadsheet.

**SAP CHANGES:**

All registrants being reduced were put into a CSV file and uploaded into SAP on February 9<sup>th</sup>. This included 2,624 customers with a total reduction of approximately 17.1 million doses. All information is located in a folder on the R drive.

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## APPENDIX/IMAGES:

## Spreadsheet Example

DEA Number	Cust Name	CSMP Dose Thres.	12M Avg	Threshold %	3M Avg	Threshold %	Av	Se	Or	Mr	De	Ja	6 M	Ma- Buff	Reduc- tion Amo	Reduc- e	Last SAP Ch	Last Am- nt	Text
	WAL-MART DC 6049P	2,390,000																	ON-BOARD C
	CVS LA HABRA-BRAN	627,000																	
	ADVANTAGE LOGISTIC	577,000																	
	ADVANTAGE LOGISTI	577,000																	
	AMERICAN SALES CO	172,000																	
	Z2ZEGMANS CENTR/	106,000																	
	CVS/CIM 2921 WS/DS	74,000																	
	CAREMARK (SAT) FDI	74,000																	
	OPTUMRX	74,000																	
	AETNA RX HOME DELI	134,000																	
	RALEY'S PHARMACY	76,000																	

## SAP Change Validation

CSMP: Base Code Monitoring: Threshold Maintain	
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YATPS1_DEA_THRESHOLD On-Line Submissions Page 1	
ELTWS06 PRO CSMP: Base Code Monitoring: Threshold Maintain 03/09/2015 06:36:10	
File Loaded: C:\Users\elytws06\Desktop\Oxycodone Threshold Reduction Project\9143 Threshold Reduction CSV File 2-8-15.csv	
Total Records Processed: 2,624	
Successfully Processed: 2,624	

## Reporting Example

Chain Name	# of Registrants	Nov Avg	Dec Avg	Jan Avg	Avg Threshold	# of Registrants Reduced	% of Registrants Reduced	Total Reduction	% of Total Threshold	Total Threshold Amount
RITE AID	4,566									
CVS	1,754									
WALMART Warehouse	1									
ALBERTSONS	766									
SUPERVALU Ware House	2									
COSTCO	480									
CVS Warehouse	1									
Topco - RALEY'S	96									
Topco - BASHAS	41									
TARGET	1,665									
CAREMARK	56									

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Chain Name	# of Registrants	Nov Avg	Dec Avg	Jan Avg	Avg Threshold	# of Registrants	% of Registrants	Total Reduction	% of Total Threshold	Total Threshold Amount
RITE AID	4,566									
CVS	1,754									
WALMART Warehouse	1									
ALBERTSONS	766									
SUPERVALU Ware House	2									
COSTCO	460									
CVS Warehouse	1									
Topco - RALEY'S	98									
Topco - BASHAS	41									
TARGET	1,665									
CAREMARK	55									
PUBLIX	950									
AHOLD	564									
AHOLD Warehouse	1									
A&P	179									
WEGMAN	85									
GIANT EAGLE	219									
THRIFTY WHITE	175									
WALMART	4,281									
SUPERVALU	166									
OPTUMRX	2									
KINNEY	114									
WINN DIXIE	362									
SHOPKO	272									
HEB GROCERY	237									
Topco - ROLINDY'S	98									
Topco - K-VA-T	78									
Topco - LUNDS	15									
Topco - HY'VEE WAREHOUSE	1									
Topco - KING KULLEN	11									

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